

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 11-10201-NMG
	)	
ROBERT A. GEORGE	)	

**OPPOSITION TO DEFENDANT GEORGE'S MOTION FOR LEAVE TO FILE  
PLEADING EXCEEDING TWENTY PAGES IN LENGTH**

Defendant Robert George has moved for an order for leave to file a pleading exceeding twenty pages in length. The government opposes defendant's motion.

Defendant seeks leave to file a motion which is 75 pages in length. The motion seeks dismissal of the indictment based on a claim of vindictive prosecution and outrageous government misconduct. The defendant's claim of vindictive prosecution stems from a complete misunderstanding of the true facts underlying the investigation. When these facts are disclosed, defendant's claim of vindictive prosecution and outrageous government misconduct will undoubtedly fail. Many pages of the defendant's motion contain an analysis of the facts relating to the case of *United States v. Bunchan*. The *Bunchan* case has no relevance whatsoever to the instant case and any analysis of such facts is completely superfluous.

In addition to the motion being completely without merit, it is a tedious, and at times rambling, recitation of all of the

perceived weaknesses and purported inadequacies in the government's case. None of these alleged weaknesses are grounds for dismissal of the indictment.

Not only is a filing of this length unnecessary but it is an extraordinary waste of the Court's time and resources. For all of these reasons, the government opposes defendant's motion and requests that it be denied.

Respectfully submitted,

CARMEN M. ORTIZ  
UNITED STATES ATTORNEY

By: /s/Laura J. Kaplan  
Laura J. Kaplan  
Assistant U.S. Attorney

October 14, 2011

**CERTIFICATE OF SERVICE**

I, Laura J. Kaplan, Assistant United States Attorney, do hereby certify that this document, filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non registered participants on this date.

/s/ Laura J. Kaplan  
Laura J. Kaplan